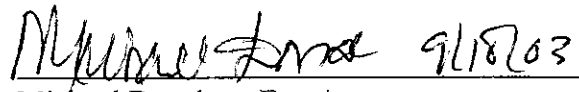


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

ELIZABETH GALLOWAY, et al.	:	
Plaintiffs	:	
v.	:	C.A. #01-0835
SOUTHWARK PLAZA LIMITED	:	
PARTNERSHIP, et al.	:	
Defendants	:	

PRAECIPE TO ENTER OF RECORD THE AUGUST 13, 2003 LETTER OF  
FINAL APPROVAL OF THE SETTLEMENT AGREEMENT BY THE U.S.  
DEPARTMENT OF HOUSING & URBAN DEVELOPMENT

Kindly docket the attached copy of the August 13, 2003 letter from Malinda Roberts,  
Director of the Office of Public Housing for the Philadelphia Office of the U.S. Department of  
Housing & Urban Development, addressed to Carl Greene, Executive Director of the  
Philadelphia Housing Authority, approving all of the lease and grievance procedures in the above  
matter.

Handwritten signature of Michael Donahue in black ink, with the date 9/18/03 written to the right.

Michael Donahue, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
215-981-3769  
Counsel for Plaintiffs

AUG 13 2003 5:05PM PHILA HOUSING AUTH. 215 656 3427 TO 912150347E12 P.2/2p.02



U.S. Department of Housing and Urban Development

Philadelphia Office  
The Wanamaker Building  
100 Penn Square East  
Philadelphia, Pennsylvania 19107-3380

**AUG 13 2003**

Mr. Carl R. Greene  
Executive Director  
Philadelphia Housing Authority  
12 S. 23<sup>rd</sup> Street  
Philadelphia, PA 19103

Dear Mr. Greene:

This is in response to the Authority's letter dated July 9, 2003, which transmitted the lease and grievance procedures for The Courtyard Apartments at Riverview. These documents are part of a settlement in the Elizabeth Galloway, et al.v. Southwark Plaza Limited Partnership litigation. In accordance with the conditions of the proposed settlement, HUD's Office of Regional Counsel has approved the proposed settlement on the condition that the Office of Public Housing approve the lease and grievance procedures. We have completed our review of the lease and grievance procedures.

Based upon our review of the documents, we have some concerns regarding Section 7 (B) (2) - Redetermination of Eligibility, Rent or Dwelling Size. Specifically, the lease is proposing that "all costs associated with transfers be the responsibility of the transferring tenant family", regardless of whether the landlord initiates the transfer. Section 7 (D) states: "The Tenant understands that if the unit in which they are residing is an accessible unit and no member of the Tenant's household requires the accessible features of the unit, the Landlord may require the family to move to another unit when another resident or applicant request a unit with the accessible features of the unit. Failure of Tenant to move without a valid reason is a violation of the terms of the Lease and may be grounds for termination of tenancy."

In light of these circumstances, we recommend that the lease and/or lease addendum include provisions to assure that tenants are not burdened with relocation expenses, which may include re-connection fees and moving costs, related to the above-mentioned circumstances. The lease and grievance procedures are acceptable.

If you have any questions concerning this matter, please contact Monica A. Hawkins, Senior Public Housing Revitalization Specialist at (215) 656-0584, ext-3319. Our TTY number for the hearing impaired is (215) 656-3450.

Sincerely,

A handwritten signature in dark ink, appearing to read "Malinda Roberts".

Malinda Roberts  
Director  
Office of Public Housing

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA


ELIZABETH GALLOWAY, et al.	:	
Plaintiffs	:	
v.	:	C.A. #01-0835
SOUTHWARK PLAZA LIMITED	:	
PARTNERSHIP, et al.	:	
Defendants	:	

CERTIFICATION OF SERVICE

It is hereby certified by Michael Donahue, Esquire, counsel for the plaintiffs in the above matter, that he served a copy of the foregoing praecipe to enter of record the August 13, 2003 letter from Malinda Roberts, Director of the Office of Public Housing for the Philadelphia Office of the U.S. Department of Housing & Urban Development, addressed to Carl Greene, Executive Director of the Philadelphia Housing Authority, approving all of the lease and grievance procedures in the above matter upon the following parties, by letter dated September 18, 2003, mailed by first class mail, postage prepaid to the following addresses:

Denis J. Lawler, Esquire  
Blank Rome, LLP  
One Logan Square  
Philadelphia, PA 19103  
Counsel for PHA Defendants

Jeffrey A. Lutsky, Esquire  
Stradley Ronon, LLP  
2600 One Commerce Square  
Philadelphia, PA 19103  
Counsel for Southwark Defendants

  
\_\_\_\_\_  
Michael Donahue, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
215-981-3769  
Counsel for Plaintiffs